

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

ESTATE OF ELEANOR NORTHINGTON,

Plaintiff,

v.

CITY OF INDIANAPOLIS, LANE COOPER,
ROBERT HALEY, JR., JUSTIN HYDE,
BRUCE JACKSON, AND
RONALD MONDAY,

Defendants.

Case No. 1:21-cv-406-TWP-TAB

AFFIDAVIT OF RONALD MONDAY

I, Ronald Monday, being duly sworn and under oath, testifies that:

1. I am over the age of eighteen.
2. I am competent to testify about the facts in this affidavit, and it is based on my personal knowledge.
3. I am a patrol officer for the Indianapolis Metropolitan Police Department (“IMPD”) and have been so employed since December 2017.
4. On February 6, 2019, I was working within the course and scope of my employment with the City of Indianapolis when I responded to a call for service at the church where Eleanor Northington was having a mental crisis, disrupting the church service, and physically assaulting people.
5. By the time I arrived on scene, Ms. Northington had already been detained in handcuffs which were daisy-chained behind her back. Daisy-chained

- handcuffs are when two or more pairs of handcuffs are connected together.
6. Officers, including myself, were attempting to conduct an immediate detention of Ms. Northington so she could be taken to the hospital and obtain whatever treatment was recommended by medical professionals.
 7. I helped other officers move Ms. Northington from the pews to the ground in the center aisle of the church after she had been detained in handcuffs.
 8. I did not use any physical force on Ms. Northington or take any actions to restrain her once we moved her to the ground – where she continued to actively resist by kicking, fighting, squirming, spitting, and biting.
 9. I initiated CPR after Ms. Northington's handcuffs were removed and she was placed on her back.
 10. I was not charged with any criminal offense for my February 6, 2019 conduct.
 11. An internal affairs ("IA") investigation conducted by IMPD also concluded that I did not violate any of IMPD's rules, regulations, or general orders.

FURTHER AFFIANT SAYETH NAUGHT.

AFFIRMATION

I hereby affirm under the penalties of perjury that the foregoing representations are true to the best of my knowledge and belief.

March 31st, 2022
Dated

/s/ Ronald Monday
Ronald Monday